

Hearing Date: December 20, 2017, 9:30 a.m. (A.S.T.)

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,

Debtor.¹

PROMESA
Title III

No. 17 BK 3283-LTS
(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO

as representative of

THE PUERTO RICO SALES TAX FINANCING
CORPORATION (“COFINA”),

Debtor.

PROMESA
Title III

No. 17 BK 3284-LTS

**LIMITED JOINDER OF ASSURED GUARANTY CORP. AND ASSURED GUARANTY
MUNICIPAL CORP. TO AMBAC ASSURANCE CORPORATION’S MOTION FOR
ENTRY OF ORDER AUTHORIZING DISCOVERY UNDER BANKRUPTCY RULE 2004**

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (“Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

To the Honorable United States District Court Judge Laura Taylor Swain:

Assured Guaranty Corp. (“AGC”) and Assured Guaranty Municipal Corp. (f/k/a Financial Security Assurance Inc.) (“AGM,” and together with AGC, “Assured”) hereby respectfully submits this limited joinder (“Limited Joinder”)¹ in support of the relief sought in *Ambac Assurance Corporation’s Motion For Entry Of Order Authorizing Discovery Under Bankruptcy Rule 2004* (ECF No. 1873) (the “2004 Motion”), and further states that:

1. Like Ambac, AGM has financial exposure to COFINA bonds.² AGM insures approximately \$271 million in gross par outstanding principal amount of Subordinate Bonds. Assured therefore has a similar interest in receiving any information that may be produced, and in participating in any depositions that may be taken, concerning how the collection of the SUT has been affected by Hurricane Maria.

2. Through this Limited Joinder, Assured seeks to join in the relief requested in the 2004 Motion for the purposes of receiving any documents obtained by, and participating in any depositions taken in connection with, the 2004 Motion. Assured, therefore, respectfully requests that any order entered by the Court pursuant to the 2004 Motion expressly provide that Assured shall receive all documents obtained by, and participate in all depositions taken in connection with, the 2004 Motion.

3. Nothing herein shall prejudice Assured’s right to independently seek Rule 2004 discovery from the Oversight Board, AAFAF, the Commonwealth, COFINA, or any other party.

¹ Assured joins in the relief being sought by Ambac, but does not join in all of the statements made by Ambac in the 2004 Motion, including but not limited to certain statements in paragraphs 2, 9 and 12-16.

² Capitalized terms not defined herein shall have the meaning ascribed to them in the 2004 Motion.

Dated: San Juan, Puerto Rico
December 8, 2017

CASELLAS ALCOVER & BURGOS P.S.C. CADWALADER, WICKERSHAM & TAFT LLP

By: /s/ Heriberto Burgos Pérez

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CERTIFICATE OF SERVICE

I hereby certify that I filed this document electronically with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to all parties of record in the captioned case. Further, I directed that the following counsel of record be served by U.S. Mail:

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At San Juan, Puerto Rico, this 8th day of December, 2017.

/s/ Heriberto Burgos Pérez
Heriberto Burgos Pérez
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